



Railroad Commission of Texas

## **Pipeline Permits – Common Issues and Mapping Overview**

August 11, 2021

The meeting will begin shortly.





# Pipeline Permits – Common Issues and Mapping Overview

August 11, 2021

Presented by Karley Bisbano

The meeting will begin shortly.



# Power Point Presentation



This presentation is available for download from the RRC website at <https://www.rrc.texas.gov/oil-and-gas/workshops-and-conferences/rrc-regulatory-webinars/regulatory-webinars-2021-schedule/>

# Agenda



- Common Renewal Errors
- Required Documents
- Updated Cover Letter
- Permitting Reminders
- Transfer Merge Review
- Common Mapping Errors
- Questions

# Common Renewal Errors (1 of 4)



- Mileage discrepancy
- Wrong submission type
- Incomplete Documents

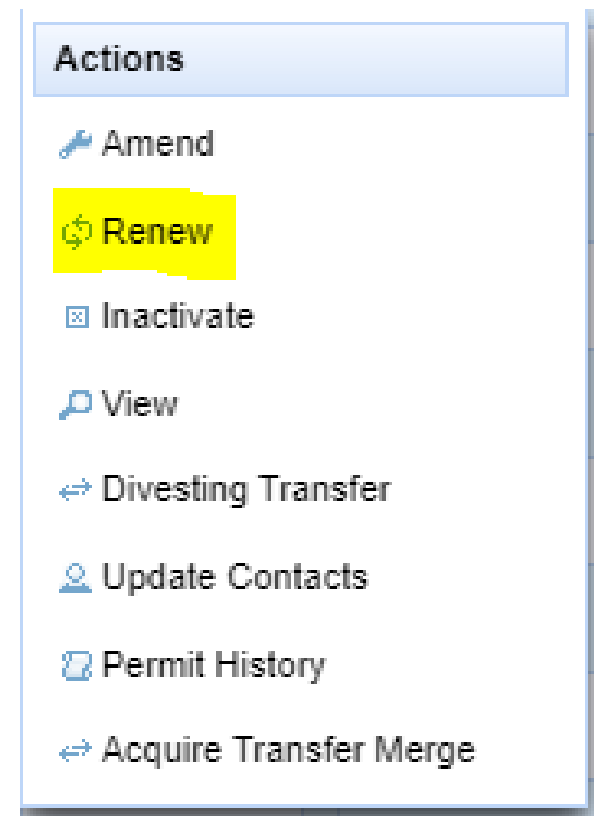


- Mileage Discrepancy
  - Occurs when the mileage on the cover letter does not match the mileage in the shapefiles
  - Results in a rejection
  - Operator can either
    - 1. Correct the mileage on the cover letter to agree with the shapefiles or
    - 2. Acknowledge the difference on the cover letter and commit to an amendment after the renewal.

# Common Renewal Errors (3 of 4)



- Wrong Submission Type
  - For example, operator selects "Amend" but is looking to renew the permit
  - Renewals are separate from Amendments/Changes and must be submitted separately from each other





- Incomplete Documents
  - Occurs when important information is left of the Cover Letter for the submission
  - Mostly seen with mileage
  - All renewals require the active mileage of the permit to be included



# Required Documents (1 of 3)



	Cover Letter	T-4B (transfer certification)	Non-Utility Certificate	Overview Map	Digital Shapefiles	Permit work for other permit(s)	New Construction Report
<b>new permit, new pipeline</b>	required	n/a	may be required for Gas permits	required	required	n/a	see 16 TAC § 8.115 for applicability
<b>new permit, pipeline transferred from existing permit</b>	required	required	may be required for Gas permits	required	required	required, within 30 days of transfer	not required
<b>total transfer (Operator Change)</b>	required	required	may be required for Gas permits	not required	not required	required, within 30 days of transfer	not required
<b>Total transfer/merge - full transfer into acquiring operator existing permit</b>	required	required	may be required for Gas permits	required	required	required, within 30 days of transfer	not required
<b>partial transfer, to/from existing permit</b>	required	required	may be required for Gas permits	required	required	required, within 30 days of transfer	not required
<b>Amend, adding/removing pipeline, to/from existing permit</b>	required	n/a	may be required for Gas permits	required	required	n/a	see 16 TAC § 8.115 for applicability
<b>renewal</b>	required	n/a	not required	required	not required	n/a	not required
<b>inactivate permit</b>	required	n/a	not required	not required	not required	n/a	not required
<b>notes</b>		acquiring operator signs top of form, divesting operator signs bottom	NUC is required for operators of private gas lines who may otherwise look like a Gas Utility	8.5" x 11" PDF	Check our mapping page for the requirements		H <sub>2</sub> S notices are for Oil & Gas Division; for more information contact Field Ops 512-463-6830

# Required Documents (2 of 3)



	Cover Letter	48 (transfer certification)	Non-Utility Certificate	Overview Map	Digital Shapefiles	Permit work for other permit(s)	New Construction Report
new permit, new pipeline	required	n/a	may be required for Gas permits	required	required	n/a	see 16 TAC § 8.115 for applicability
new permit, pipeline transferred from existing permit	required	required	may be required for Gas permits	required	required	required, within 30 days of transfer	not required
total transfer (Operator Change)	required	required	may be required for Gas permits	not required	not required	required, within 30 days of transfer	not required
Total transfer/merge - full transfer into acquiring operator existing permit	required	required	may be required for Gas permits	required	required	required, within 30 days of transfer	not required
partial transfer, to/from existing permit	required	required	may be required for Gas permits	required	required	required, within 30 days of transfer	not required
Amend, adding/removing pipeline, to/from existing permit	required	n/a	may be required for Gas permits	required	required	n/a	see 16 TAC § 8.115 for applicability
renewal	required	n/a	not required	required	not required	n/a	not required
inactivate permit	required	n/a	not required	not required	not required	n/a	not required
notes		acquiring operator signs top of form, divesting operator signs bottom	NUC is required for operators of private gas lines who may otherwise look like a Gas Utility	8.5" x 11" PDF	Check our mapping page for the requirements		H <sub>2</sub> S notices are for Oil & Gas Division; for more information contact Field Ops 512-463-6830

# Required Documents (3 of 3)



- To view the Required Documents pdf, follow this link:
  - <https://rrc.texas.gov/media/5s2fl0ym/pipeline-permit-cheat-sheet.pdf>

# Updated Cover Letter (1 of 4)



- Universal Cover Letter that can be used for all submission types
- Includes all required fields to help lower rejections

# Updated Cover Letter (2 of 4)



## POPS FILLABLE COVER LETTER

**INSTRUCTIONS:** The Form C-LTR POPS Fillable Cover Letter is used to provide updates or context on a permit application. It can be used to notify the Commission of an application for Renewal, New Permit, Inactivate, or Amendment. Only fill out the corresponding section(s) based on the **APPLICATION TYPE**. The form will show and hide sections based on the **APPLICATION TYPE** to facilitate ease of use. For more detailed instructions, refer to [Form C-LTR Submittal Guidelines](#).

### OPERATOR INFORMATION

Operator Name

Operator Agent Name

P-5 Number

T-4 Permit Number

Date

### APPLICATION TYPE

☐

Renewal

☐

New Permit

☐

Inactivate

☐

Amendment

### RENEWAL

*Only fill out this section of the form if the application being filed is for a Renewal. Renewal applications are used to complete the annual pipeline permit renewal. They cannot be used to report changes.*

Was eminent domain ever declared for this permit?

☐

Yes

☐

No

Total Active Renewal Permit Mileage

# Updated Cover Letter (3 of 4)



## NEW PERMIT

Only fill out this section of the form if the application being filed is for a New Permit. New Permit applications are used to create a new gas or liquid permit.

Was eminent domain ever declared for this permit?

☐

Yes

☐

No

Total Active New Permit Mileage

Is this new permit application associated with a transfer?

☐

Yes (fill out [Form T-4B](#) and attach in POPS)

☐

No

## INACTIVATE

Only fill out this section of the form if the application being filed is for an Inactivate. Inactivate applications are used to abandon in place all lines in a permit according to TAC §8 and 49 CFR §192-195. All abandoned lines must have no intention for future use. (Idle lines cannot be abandoned.)

Are the pipelines being abandoned in place, merged into another permit, or something else?

☐

Abandoned in Place

☐

Merged into Permit

#####

☐

Other (specify)

## AMENDMENT

Only fill out this section of the form if the application being filed is for an Amendment. Amendment applications are used to report changes to an existing permit. Indicate all changes that are being made along with the mileage being changed for this permit application. If you are reporting a transfer, make sure to also fill out [Form T-4B](#). The two-letter codes correspond with the T4\_AMD field in the shapefile; more information on the T4\_AMD codes can be found in [A Guide to Shapefile Submissions](#).

☐

PA: Pipeline Addition (newly built pipeline)

Mileage Change

☐

BP: Abandoned in Place (must be completely abandoned)

Mileage Change

☐

FC: Fluid Change (product change)

Mileage Change

☐

TM: Transfer Merge (acquire full transfer and merge into existing permit)

Mileage Change

☐

MP: Merge Permits (consolidate permits within the same P-5)

Mileage Change

☐

PT: Partial Transfer (transfer part of a pipeline system to/from a different P-5)

Mileage Change

# Updated Cover Letter (4 of 4)



<input type="checkbox"/> PM: Partial Merge (transfer part of a pipeline system within the same P-5)	<input type="text"/>	<input type="checkbox"/> OM: Other Modification (specify below)	<input type="text"/>
	Mileage Change		Mileage Change
<input type="checkbox"/> DP: Delete Pipeline (remove a pipeline from an existing permit)	<input type="text"/>	<input type="checkbox"/> FT: Full Transfer (transfer a full permit to/from a different P-5; <i>no shapefile required</i> )	<input type="text"/>
	Mileage Change		Mileage Change

If MP:

If PM: ☐ Acquiring ☐ Divesting

If PT: ☐ Acquiring ☐ Divesting

If FT: ☐ Acquiring ☐ Divesting

If DP:

If OM:

<input type="text"/>	<input type="text"/>
----------------------	----------------------

Total Active Mileage **Before** Amendment Changes

Total Active Mileage **After** Amendment Changes

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## ADDITIONAL INFORMATION

*Provide any other information that relates to the permit application.*



# Permitting Reminders



# What can be combined



- Here is what can be combined:
  - Gathering and Transmission
  - H<sub>2</sub>S with no H<sub>2</sub>S
  - Lines not connected
  - Crude and Refined Products, all on the same is ok

# What cannot be combined



- Here is what cannot be combined:
  - Gas and Liquids
  - Private lines and any Common Carrier (liquids) or Gas Utility (gas) lines
  - Different economic operators
  - Different owners
  - Interstate and Intrastate

# 2022 Mileage Fee



- Miles calculated Dec 31, 2021.
- If changes are needed to your permit mileage, amend before Dec 1st 2021
- This will allow us 30 days to review your submissions
- Submissions made after Dec 1st cannot be guaranteed to be completed before Dec 31st



Questions?



# Pipeline Mapping Updates

# Mapping Presentation Overview



- Reminder: new Transfer Merge
- Most common shapefile submission errors
- New form: POPS Cover Letter Form

# Transfer Merge (1 of 3)



If you are the acquiring operator in a Full Transfer, you have the following two options:

- **Acquire Full Transfer** application
- **Acquire Transfer Merge** application

# Transfer Merge (2 of 3)



Which type should I use?

- Use **Acquire Full Transfer** if you want to take over the permit number and add it to your list of permits
- Use **Acquire Transfer Merge** if you want to combine transferred lines with one of your existing permits



# Transfer Merge (3 of 3)



## Full Transfer

- Divesting side files first
- Pay renewal fee upon acquisition
- Can only acquire one permit at a time
- No mapping required for either side
- Divesting permit number transferred to acquiring operator

## Transfer-Merge

- Divesting side files first
- No renewal fee upon acquisition
- Can acquire multiple permits at once
- Mapping required for acquiring side
- Divesting permit number becomes inactive and acquiring operator chooses keeper permit

# Mistake #1



## **#1. Incomplete or missing documents**

- T4-B required for ALL transfers
  - Must be signed by both parties
- Refer to the Pipeline Permit Guidance Sheet



## #2. Lines missing from shapefile

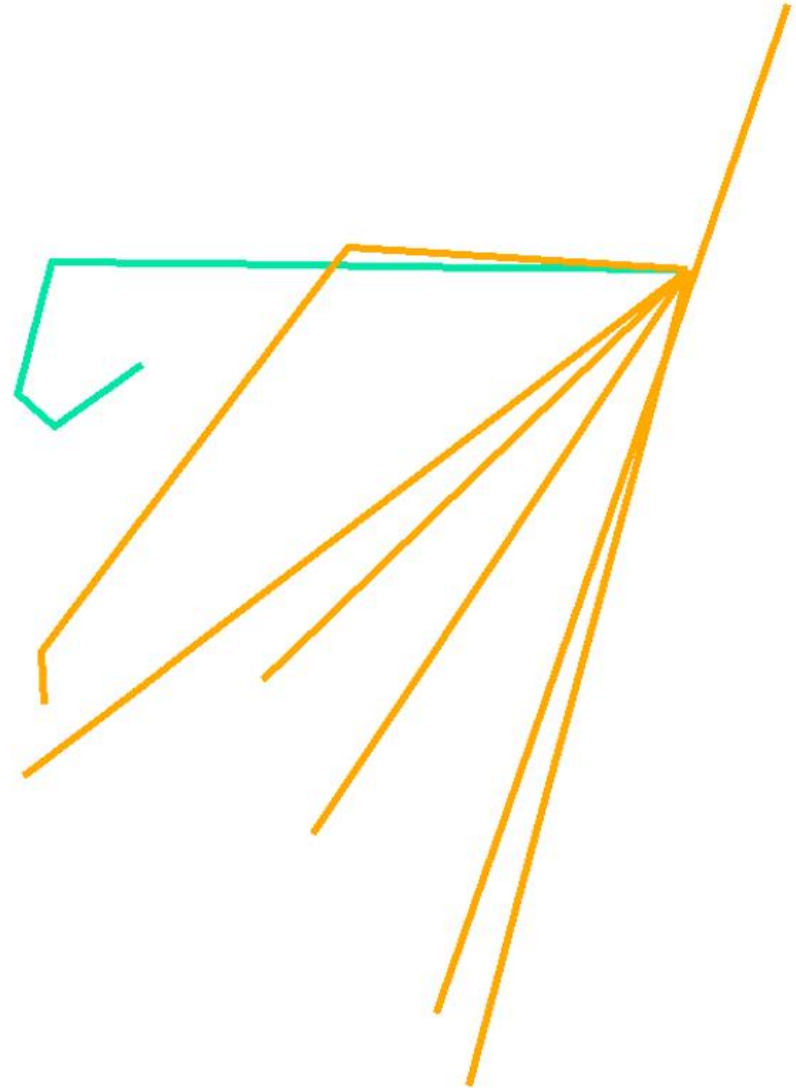
- New shapefile submissions entirely replace what is on record for the permit
- New shapefile needs to show the entire permit, both existing and new lines.
- Shapefile must always include abandoned lines.

# Mistake #2 (2 of 2)





## Overview Map

*Permit 01234*



### T4 Amendment Code

-  No Change (NC)
-  Pipeline Addition (PA)



## **#3. Mix-up between cover letter and shapefile**

"Are your cover letter and your shapefile telling the same story?"

## Mistake #3 (2 of 2)



### Three most common mix-ups

1. The type of amendment(s)
  - e.g. The cover letter contains a change that is not in the shapefile, or vice versa
2. The mileage associated with the amendment(s)
  - e.g. The cover letter mentions 5 miles of new line but the shapefile shows 10 miles
3. The new total active mileage
  - e.g. Your cover letter says the new total mileage after changes is 5 but the shapefile shows 10



Quick tangent!

Let's talk about a new form:  
the POPS Cover Letter Form



- Created to help with cover letter errors
- The new form will make it clear what information is required for each application type



# POPS Cover Letter Form (3 of 7)



## 1. The type of amendment(s)

☐ PA: Pipeline Addition (newly built pipeline)

☐ FC: Fluid Change (product change)

☐ MP: Merge Permits (consolidate permits within the same P-5)

☐ PM: Partial Merge (transfer part of a pipeline system within the same P-5)

☐ DP: Delete Pipeline (remove a pipeline from an existing permit)

Mileage Change

Mileage Change

Mileage Change

Mileage Change

Mileage Change

☐ BP: Abandoned in Place (must be completely abandoned)

☐ TM: Transfer Merge (acquire full transfer and merge into existing permit)

☐ PT: Partial Transfer (transfer part of a pipeline system to/from a different P-5)

☐ OM: Other Modification (specify below)

☐ FT: Full Transfer (transfer a full permit to/from a different P-5; *no shapefile required*)

Mileage Change

Mileage Change

Mileage Change

Mileage Change

Mileage Change

Total Active Mileage **Before** Amendment Changes

Total Active Mileage **After** Amendment Changes

# POPS Cover Letter Form (4 of 7)



## 2. Mileage associated with the amendment(s)

☐ PA: Pipeline Addition (newly built pipeline)

☐ FC: Fluid Change (product change)

☐ MP: Merge Permits (consolidate permits within the same P-5)

☐ PM: Partial Merge (transfer part of a pipeline system within the same P-5)

☐ DP: Delete Pipeline (remove a pipeline from an existing permit)

Mileage Change

Mileage Change

Mileage Change

Mileage Change

Mileage Change

☐ BP: Abandoned in Place (must be completely abandoned)

☐ TM: Transfer Merge (acquire full transfer and merge into existing permit)

☐ PT: Partial Transfer (transfer part of a pipeline system to/from a different P-5)

☐ OM: Other Modification (specify below)

☐ FT: Full Transfer (transfer a full permit to/from a different P-5; *no shapefile required*)

Mileage Change

Mileage Change

Mileage Change

Mileage Change

Mileage Change

Total Active Mileage **Before** Amendment Changes

Total Active Mileage **After** Amendment Changes

# POPS Cover Letter Form (5 of 7)



## 3. New total active mileage

☐ PA: Pipeline Addition (newly built pipeline)

Mileage Change

☐ FC: Fluid Change (product change)

Mileage Change

☐ MP: Merge Permits (consolidate permits within the same P-5)

Mileage Change

☐ PM: Partial Merge (transfer part of a pipeline system within the same P-5)

Mileage Change

☐ DP: Delete Pipeline (remove a pipeline from an existing permit)

Mileage Change

☐ BP: Abandoned in Place (must be completely abandoned)

Mileage Change

☐ TM: Transfer Merge (acquire full transfer and merge into existing permit)

Mileage Change

☐ PT: Partial Transfer (transfer part of a pipeline system to/from a different P-5)

Mileage Change

☐ OM: Other Modification (specify below)

Mileage Change

☐ FT: Full Transfer (transfer a full permit to/from a different P-5; *no shapefile required*)

Mileage Change

Total Active Mileage **Before** Amendment Changes

Total Active Mileage **After** Amendment Changes

# POPS Cover Letter Form (6 of 7)



We added more fields to prompt operators to add all required information:

If MP: List all merged permits...

If PM: ☐ Acquiring ☐ Divesting

List all merged permits...

If PT: ☐ Acquiring ☐ Divesting

List all acquired or divested permits...

If FT: ☐ Acquiring ☐ Divesting

List all acquired or divested permits...

If DP: Select one of the following or type in a reason...

If OM: Specify OM: Other Modification...

Total Active Mileage **Before** Amendment Changes

Total Active Mileage **After** Amendment Changes

# POPS Cover Letter Form (7 of 7)



If you need more room, use the Additional Information box at the bottom of the form:

## **ADDITIONAL INFORMATION**

*Provide any other information that relates to the permit application.*



## **#4. Shapefile is missing required fields**

- A Guide to Shapefile Submissions lists the 15 required fields. All shapefile submissions must contain these 15 fields.
- If you have rural liquid gathering lines between 6.63"-8.83", then two additional fields are required: SMYS and USA

## #5. Invalid coordinate system

- A Guide to Shapefile Submissions lists the correct coordinate system to use in your shapefile: NAD 1927 or NAD 1983 (unprojected).

### 1. Coordinate Systems

---

Shapefiles must be using one of two coordinate systems: *NAD 1927* or *NAD 1983*. These are geographic coordinate systems (GCS), meaning they use an angular unit of measurement (e.g. degrees). We do not accept shapefiles that are using a projected coordinate system (PCS), meaning they use a linear distance of measurement (e.g. feet).



## #6. Shapefile contains fields with invalid character limit / data type

- A Guide to Shapefile Submissions lists the correct character limit and data type for every required field

1. P5\_NUM

"P-5 Operator Number"

*(Data Type: Text, Character Limit: 6)*

A six-digit number assigned by the RRC to identify a pipeline operator (not the pipeline owner).



## **#7. Invalid characters in shapefile name**

- Some characters in the shapefile name can make the file unreadable in GIS
  - Valid characters: letters, numbers, underscores
    - Amendment\_01234.dbf
  - Invalid characters: spaces, periods, special characters
    - A.B.C. Pipeline Company @ 01234.dbf

# Useful Links



- Permitting & Mapping page
  - <https://www.rrc.texas.gov/pipeline-safety/permitting-and-mapping/>
- A Guide to Shapefile Submissions
  - [https://www.rrc.texas.gov/media/ydkapdub/a\\_guide\\_to\\_shapefile\\_submissions.pdf](https://www.rrc.texas.gov/media/ydkapdub/a_guide_to_shapefile_submissions.pdf)
- Pipeline Permit Guidance Sheet
  - <https://www.rrc.texas.gov/media/5s2fl0ym/pipeline-permit-cheat-sheet.pdf>



# Questions



## – Pipeline Permitting General Contact

- 512-463-6802
- [POPS@rrc.texas.gov](mailto:POPS@rrc.texas.gov)

## – Ryan Hejl

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# Resources



- **Pipeline Fees:** <https://rrc.texas.gov/pipeline-safety/pipeline-fees/>
- **Permitting and Mapping:** <https://rrc.texas.gov/pipeline-safety/permitting-and-mapping/>
- **PS-48 Reports:** <https://rrc.texas.gov/pipeline-safety/reports/new-pipeline-construction-reports/>
- **Required Permit Documents:** <https://rrc.texas.gov/media/5s2fl0ym/pipeline-permit-cheat-sheet.pdf>
- **How to create POPS filer accounts:** <https://rrc.texas.gov/forms/online-filing-at-rrc/maintaining-filer-accounts/>



## Evaluation

- Please complete the evaluation available on the RRC website at <https://survey.alchemer.com/s3/6403402/2021-RRC-Regulatory-Webinars-Oil-Gas-and-Pipeline-Safety-Evaluation>

## Archive Video

- A link to the archive video of the webcast will be available on the same webpage as the presentation.